

## Document Log Item

Addressing	
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<b>Description</b> <span style="float: right;">Form Used: Memo</span>	
<b>Subject</b>	<b>Date/Time</b>
FW: Vulnerability Evaluation should be conducted	1/4 IZ #v%
<b># of Attachments</b>	<b>Total Bytes</b>
0	10,906
<b>NPM</b>	<b>Contributor</b>
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Body

## Document Body

Ned

I raised the US EPA Vulnerability Evaluation during the 10 AM meeting of August 25 at SolanoCounty when Michael Profant was the lead planner.

From my email below, I forwarded this email to Shell Oil, their consultants and the US EPA.

My recommendations still stand.

I have received verbal assurances that the project is safe. However, we still need a risk assessment document on this site specific project for the Planning Commission and the General Public. Verbal assurances during the public hearings are simply insufficient. If we do not have this document available, the planning commission will be reluctant to make any decision on this project which will prolong the Use Permit process.

Vic

**From:** Chan, Victor M.

**Sent:** Tuesday, August 25, 2009 1:35 PM

**To:** 'barbara.kornylo@shell.com'; 'wayne.hamilton@shell.com'

**Cc:** Iravani, Saeed N.; Kaltreider, Misty C.; Bell, Jeffery; Leland, James H.; 'fgolden@aspenerg.com'; 'jhbeyer@IbI.gov'; 'heath.nevels@shell.com'; Geisert, Matthew; 'hpapp@consvr.ca.gov'; 'edwardhymes@shell.com'; 'freedman.adam@epa.gov'; Burton, Nicholas S.; Profant, Michael E.; Serrano, Ricardo; Schmidtbauer, Terry; Louie, James A.

**Subject:** Vulnerability Evaluation should be conducted

Barbara and Wayne

I want to thank all attendees for the presentation. The presentation answered all of my questions that I raised in an earlier email and I do appreciate that.

FYI. The US EPA's Vulnerability Evaluation is located at:

[http://www.epa.gov/climatechange/emissions/downloads/VEF-Technical\\_Document\\_072408.pdf](http://www.epa.gov/climatechange/emissions/downloads/VEF-Technical_Document_072408.pdf)

The purpose of the US EPA's Vulnerability document is stated in the introduction of this document which I have cut and pasted below:

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**A large body of literature indicates that GS is a viable technology that can be conducted in a safe manner when coupled with a comprehensive approach to ensure protection of human health and the environment. Nonetheless, there are potential risks and uncertainties associated with GS. To systematically identify those conditions that could increase the potential for adverse impacts from GS, the U.S. Environmental Protection Agency (EPA) has developed a Vulnerability Evaluation Framework (VEF)**

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I intend to recommend to the Solano County's Planning Division that a "Vulnerability Evaluation" be conducted for this project. This will ensure no adverse impact will be developed by this project. This will make adoption by the Planning Commission and by the General Public a lot easier ...assuming a Vulnerability Evaluation Report concludes that there is a low risk (and not an elevated risk) and that the project follows this EPA's vulnerability framework which includes construction and monitoring. The EPA document is somewhat generic but systematic. It is my professional opinion that compliance with this EPA document will lower the project risk.

**Victor M Chan, PE, BCEE**

**Solano County Civil / Environmental Engineer**

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